

Master Planning & NEPA

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Outline

- Purpose of NEPA
- Four levels of NEPA action
- Focused NEPA
- AR 210-20 & NEPA
- The ISOWPP
- References and Resources



Purpose of NEPA

For decision-makers
to make informed
decisions.



NEPA

The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences,¹ and take actions that protect, restore, and enhance the environment.¹

1. Reference: Title 40 CFR Part 1500.1



NEPA

- Early integration of environmental considerations
- Promotes stakeholder involvement
- “... it is not better documents, but better decisions that count.” 40 CFR Part 1500.1(c)



Four levels of NEPA

- Categorical Exclusion
- Record of Environmental Consideration (REC)
- Environmental Assessment (EA)
- Environmental Impact Statement (EIS)



Categorical Exclusion (CX)

- Categories of actions with no individual or cumulative effect on the human or natural environment, and for which neither an EA nor an EIS is required.
- Three basic requirements
 - Action not segmented.
 - No exceptional circumstances involved.
 - Action defined by an established CX.
- Detailed list in Appendix B of 32 CFR 651



Record of Environmental Consideration (REC)

- A REC briefly documents that an Army action has received environmental review.
 - Prepare for CXs that require them,
 - Actions covered by existing or previous NEPA documentation – referred to as tiering.



Environmental Assessment

- Objective evaluation of potential impacts of a proposed action and their “reasonable” alternatives.
- Analysis should evaluate the:
 - Preferred alternative
 - No Action alternative
 - All other reasonable courses of action.
- Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact (FNSI).
- Must allow minimum of 30 days for public review and comment.



Environmental Assessment (EA)

- Intended to facilitate agency planning and informed decision making.
- Required to assess environmental impacts and evaluate their significance, and
- A planning document to:
 - evaluate environmental consequences from Army actions,
 - develop alternatives and mitigation measures,
 - allow for agency and public participation.



Environmental Impact Statement (EIS)

- EIS required when Army action may have significant effect on:
 - Environmental quality, or public health or safety.
 - Historic cultural, archaeological, or scientific resources, recreation areas, wildlife refuge or wilderness areas
 - Uncertain environmental effects, or unique or unknown environmental risks.



Environmental Impact Statement

- An EIS is prepared when an action may cause significant:
 - Effect on environmental quality, public health or safety;
 - Effect to historic or cultural resources;
 - Or uncertain environmental effects or unique, or unknown environmental risks;
 - Effects on federally listed threatened or endangered species; or
 - Is highly controversial from an environmental standpoint.



Programmatic NEPA analysis

- Encouraged for programs that are similar in nature or broad in scope.
- Eliminates repetitive analysis of same issues
- Subsequent NEPA summarize broad issues -- concentrate on issues specific to subsequent action
- Examples
 - Vehicle fielding
 - Installation Master Plan



Tiering

- "Tiering" is conducting focused NEPA analysis on a specific element of an earlier NEPA document of broader scope.
 - Incorporate by reference – don't, "reinvent the wheel."
 - Focus on key issues at appropriate level of project review; concentrate on issues specific to subsequent action.



Focused NEPA

“Emphasizing the portions of environmental impact statement that are useful to decision makers and the public & reducing emphasis on background material.”¹

1. 40 CFR 1500.4



Focused NEPA

- “Identify environmental effects and values in adequate detail. . .” 40 CFR 1501.2(b)
- “Incorporating by reference.” 40 CFR 1500.4(j)
- “Discussing only briefly issues other than significant ones.” 40 CFR 1500.4(c)



Scoping Process

- 40 CFR 1500.4(g):
 - Identify significant environmental issues
 - De-emphasize insignificant issues
 - Narrow the scope of the process accordingly
- Scoping Process
 - Open discussion among subject matter experts and stakeholders
 - Installation level first, with public for EIS



The Processes

Master Planning

- Identify Commander's vision
- Collect & analyze data
- Develop goals and objectives
- Develop alternative plans
- Select preferred plan
- Implement the plan
- Monitor and Amend the Plan

NEPA

- Proposal Formulated
- Scoping: CX / EA / EIS?
- Collect and Analyze Data
- Develop alternative plans (EA/EIS)
- Select preferred plan (FNSI/ROD)
- Implement the plan
- Monitor the plan

(AR 210-20, Fig 2-1, pg 7)



NEPA in AR 210-20

- Specific goals and objectives for future installation development to provide guidance for developing planning alternatives and standards for the evaluation of those plans will be identified.
(AR 210-20, para 2-4c.(3))
- Alternatives depicting the long-range development of the installation, including arrangement of functional land use areas, circulation, and utility systems, will be developed.
(AR 210-20, para 2-4)



Master Planning and Environmental Analysis

● Environmental Overlays

- Threatened & Endangered Species; critical habitat
- Flood plains
- Wetlands & buffer zones
- RCRA & pesticide storage
- Quantity-Distance Arcs (explosive storage)
- Cultural/archeological sites
- Surface water
- Firing ranges & impact areas
- Safety buffers
- Noise contours
- Low altitude aircraft operations
- Landfills (open & closed)
- Historic sites/areas



Initial Scope of Work Planning Package (ISOWPP)

- Methodology developed by Army Environmental Command that streamlines the NEPA process (Analysis and Documentation).
- Lessons learned during our involvement at training range charrettes.
- Supports the Army Master Range Planning (AMRP) process by enhancing NEPA and environmental initiatives.



ISOWPP

- Provides the ball park (scope of the action) we are considering and the key positions (important resources and issues - valued environmental components) to be evaluated
- Installation has primary responsibility in developing ISOWPP components
- Team approach in ISOWPP development – installation stakeholders and subject matter experts
- Addresses direct, indirect, and cumulative effects, as well as regulatory consultations and timelines
- Focused, risk-based approach to save time, reduce cost, result in a more concise NEPA document



ISOWPP Components

- Purpose and Need
- Proposed Action and Alternatives, with evaluation criteria
- Existing NEPA & environmental documents
- Valued environmental components (VECs)
- Recommended regulatory and environmental consultations, with brief statement of intent
- Timeline for NEPA document preparation and completion
- Notice of Intent and Delegation of Authority package (for an EIS)
- Point of Contact list



Valued Environmental Components (VECs)

- Estimate significance through scoping with stakeholders & SMEs
- Evaluate each VEC:
 - Air Quality
 - Airspace
 - Energy
 - Land use
 - Hazardous mat'l/waste
 - Wetlands
 - Socioeconomics & environmental justice
 - Cultural resources
 - Noise
 - Soil erosion
 - Water resources
 - Facilities
 - Traffic and transportation
 - Threatened and endangered species



ISOWPP Benefits

- Engages the contractor/in-house staff to prepare the NEPA document based on the Army's intent early in the decision making process
- Foundation for a focused, concise NEPA document
 - Evaluating resources and issues of importance
 - Saving time & money
 - Resulting in a quality document on which to make sound, defensible decisions



“Mining” Existing Data

- Installation Data
 - Integrated Natural Resources Mgt. Plan (INRMP)
 - Integrated Cultural Resources Mgt. Plan (ICRMP)
 - Endangered Species Management Plan
 - Integrated Pest Management Plan
 - Planning Level Surveys
 - Recent NEPA documents
 - GIS data (environmental overlays)



References and Resources

- NEPA Analysis Guidance Manual
- Army NEPA Digital Library
- AEC Website
- NEPA Desktop Reference CD
- Army NEPA listserv

www.aec.army.mil/usaec/nepa/



NEPA Analysis Guidance Manual

May 2007



NEPA Analysis Guidance Manual

May 2007



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NEPA Desktop Reference CD

US Army Environmental Center

National Environmental Policy Act (NEPA) Desktop Reference v3.0

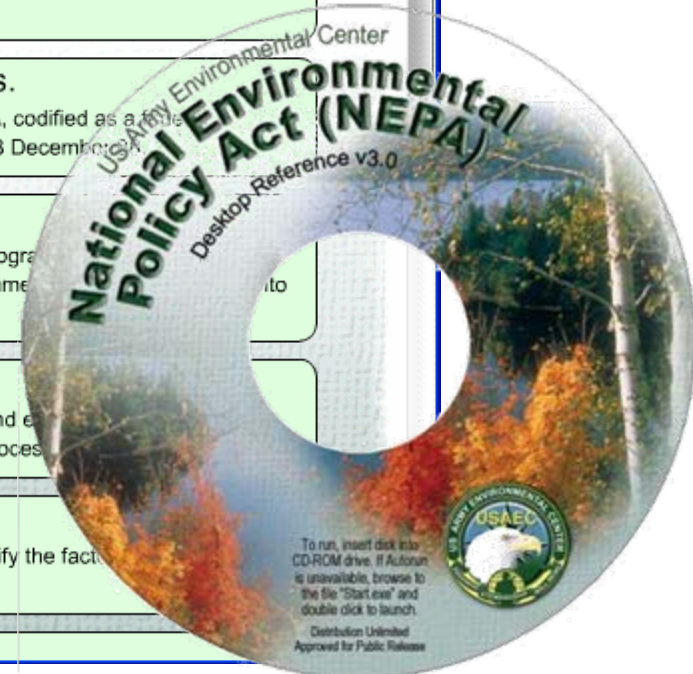
☐ Check here to open PDFs with built in viewer

Introduction | **Search All PDFs** | **Documents by Subject** | **Documents by Type** | **Glossary** | **Late Updates**

Environmental Media | Environmental Justice | Natural Resources | Noise | OCONUS | Public Outreach

Applying NEPA | Built Environment & Transportation | Cultural Resources | Cumulative Effects | Environmental Management Systems

- Title 40 CFR 1500-1508 Regulations for Implementing NEPA.**
28 Nov 1978 These regulations provide regulatory guidance on the content of, and preparation of environmental analyses.
- DoD Instruction 4715.9, Environmental Planning and Analysis.**
3 May 1996. This document implements policy and assigns responsibility of environmental considerations into DoD activity and operational planning.
- Title 32 CFR Part 651, Environmental Effects of Army Actions.**
29 March 2002. 67 Federal Register 15290. The Army's regulation on implementing NEPA, codified as a title regulation. This regulation supercedes AR 200-2, Environmental Effects of Army Actions, 23 December 1997.
- AR 200-1, Environmental Protection and Enhancement.**
21 February 1997. This regulation provides a brief overview of the Army's environmental program and also integrates pollution prevention, natural and cultural resources and the National Environmental Policy Act into the Army environment program.
- Scoping Guidance.**
30 April 1981. CEQ memorandum summarized CEQ's research into the scoping process and identified better techniques for ensuring public participation and improved efficiency in the scoping process.
- NEPA: A Study of Its Effectiveness After Twenty-five Years.**
CEQ Report, January 1997. The report studies NEPA's effectiveness, and sets out to identify the factors for ensuring success in the NEPA process.
- Compendium of Useful Practices**





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If NEPA hurts, you're probably
doing it wrong